

U.S. Department of Justice



GMP:TJS

*United States Attorney
Eastern District of New York*

*271 Cadman Plaza East
Brooklyn, New York 11201*

April 15, 2014

BY Hand and ECF

Honorable Raymond J. Dearie
Senior United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Bebars Baslan
Criminal Docket 13-220 (RJD)

Dear Judge Dearie:

I respectfully write to request additional time to file the government's response to Bebars Baslan's pre-trial motions, filed on April 1, 2014. Defense counsel has no objection to this request.

On November 22, 2013, the Court first set a briefing schedule in this case. The original schedule required the defendants, Bebars Baslan and Kristen Henry, to submit motions on January 27, 2014 and the government to respond three weeks later.

On January 22, 2014, the defendants requested additional time to file briefs due to the complexity of the issues in the case without government objection. The Court granted the request and set a new due date of March 3, 2014. On February 28, 2014, the defendants requested additional time to file without government objection. The Court granted the request and set a new due date of March 31, 2014. On March 31, 2014, the defendants requested an additional extension of one day to file their submissions, which was granted.

On April 1, 2014, defendant Bebars Baslan filed a motion dealing with a number of issues. Defendant Kristen Henry

asked to defer filing of motions until 30 days after the completion of a psychiatric evaluation.¹ Henry also joined in Baslan's motions. The government's response to Baslan's motion is currently due on April 21, 2014. Trial is currently set for July 14, 2014.

Given the complexity of the issues in the case and the briefing and trial schedules of the government's attorneys, the government respectfully requests an additional three weeks—until May 12, 2014—to respond to Baslan's motions. As indicated above, defense counsel has no objection to this request.

Respectfully submitted,

LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

By: _____
Tyler J. Smith
Assistant U.S. Attorney
718-254-6186

CC: Clerk of the Court (By ECF)
Ephraim Savitt, Esq.

¹That evaluation is required to be completed by April 31, 2014 pursuant to the Court's order.